1 THE HONORABLE ROBERT S. LASNIK 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 S.L., by and through his parents and guardians, J.L. and L.L., 10 Case No. 2:18-cv-01308-RSL Plaintiff, 11 DECLARATION OF ELEANOR HAMBURGER 12 IN SUPPORT OF PLAINTIFF'S MOTION FOR V. **SUMMARY JUDGMENT** 13 PREMERA BLUE CROSS, AMAZON CORPORATE LLC GROUP HEALTH AND 14 WELFARE PLAN, AND AMAZON 15 CORPORATE LLC, 16 Defendants. 17 18 I, Eleanor Hamburger, hereby declare under penalty of perjury and in accordance with the 19 20 laws of the State of Washington and the United States that: 21 1. I am one of the plaintiff's lawyers in this case. 22 2. Attached as Exhibit A are excerpts of the deposition of Robert Small, M.D., taken on 23 April 16, 2021 in P.E.L et al v. Premera Blue Cross, Case No. 19-2-256109-SEA (Wash. 24 Superior Court). 25 // 26 Declaration of Eleanor Hamburger in Support of Megan E. Glor, Attorneys at Law 707 NE Knott Street, Suite 101 Plaintiff's Motion For Summary Judgment - p. 1 of 2 Portland, OR 97212 (No. 2:18-cv-01308-RSL)

503-223-7400

DATED: January 13, 2023 at Seattle, Washington.

<u>s/ Eleanor Hamburger</u> Eleanor Hamburger, WSBA No. 26478 Email: ehamburger@sylaw.com

Declaration of Eleanor Hamburger in Support of Plaintiff's Motion For Summary Judgment - p. 2 of 2 (No. 2:18-cv-01308-RSL)